

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, in his official capacity as  
Governor of the State of Texas, *et al.*,

*Defendants.*

CIVIL ACTION NO.  
3:21-cv-00259-DCG-JES-JVB  
[Consolidated Action: Lead Case]

**PRIVATE PLAINTIFFS' OPPOSED MOTION TO EXTEND THE DEADLINE  
TO FILE THEIR REPLY IN SUPPORT OF THEIR MOTIONS TO COMPEL  
REGARDING PORTIONS OF DEPOSITIONS SUBJECT TO LEGISLATIVE  
PRIVILEGE OBJECTIONS**

Private Plaintiffs<sup>1</sup> respectfully request an extension of their deadline to file a consolidated reply in support of their motions to compel regarding portions of depositions subject to legislative privilege objections, from Friday, August 26, 2022 to Wednesday, August 31, 2022. *See* Dkts. 543 and 555. The Legislators stated that they would agree to an extension until August 29, 2022, but oppose a request for an extension until August 31, 2022.

Private Plaintiffs request an extension to ensure that they have sufficient time to assess and respond to the Legislators' 25-page brief in opposition to Private Plaintiffs' motions, *see* Dkt. 551, especially in light of other briefing deadlines. Private Plaintiffs are currently preparing for filing Friday their portions of the parties' joint advisory as requested by the Court. *See* Dkt.

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<sup>1</sup> Private Plaintiffs include: LULAC Plaintiffs, the Mexican American Legislative Caucus ("MALC"), Texas NAACP, the Fair Maps Plaintiffs, the Brooks Plaintiffs, the Black Congressperson Intervenors, and Plaintiff Martinez Fischer.

554. In addition, Private Plaintiffs are preparing a motion to reopen Senator Huffman's deposition for improper assertions of the attorney-client privilege. Private Plaintiffs do not seek an extension to delay these proceedings, and an extension will not prejudice the Legislators.

For the foregoing reasons, Private Plaintiffs respectfully request that their motion be granted, and that their deadline to file the consolidated reply in support of their motions to compel regarding portions of depositions subject to legislative privilege objections be extended to August 31, 2022.

DATED: August 25, 2022

Respectfully submitted,

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**CERTIFICATE OF CONFERENCE**

I hereby certify that, on August 23, 2022, counsel for LULAC Plaintiffs, on behalf of Private Plaintiffs, conferred by email with counsel for the Legislators regarding the instant motion. On August 24, 2022, counsel for the Legislators stated that they would agree to an extension until August 29, 2022, but would oppose a request for an extension until August 31, 2022.

*/s/ Nina Perales* \_\_\_\_\_  
Nina Perales

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 25th day of August 2022.

*/s/ Nina Perales* \_\_\_\_\_  
Nina Perales